

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOHN COSTANZO JR. and
MANUEL RECIO,

Defendants.

Case No. 22 Cr. 281 (JPO)

**DEFENDANT MANUEL RECIO'S MOTION TO COMPEL THE PRODUCTION OF
DOCUMENTS OR FOR AN ORDER AUTHORIZING SUBPOENAS TO THE DRUG
ENFORCEMENT AGENCY AND THE FEDERAL BUREAU OF INVESTIGATION**

Defendant Manuel Recio moves to compel the government to produce specific portions of DEA and FBI manuals and policy statements regarding (1) the heart of the government's allegations in the Indictment that co-defendant Special Agent John Costanzo, Jr. violated his official or lawful duty and (2) the use of a confidential informant, the genesis of the investigation in this case and the subject of presently pending Motions to Suppress, or alternatively, for an order authorizing the issuance of subpoenas to the to the Drug Enforcement Agency and the Federal Bureau of Investigation seeking the foregoing manuals and policy statements.

In support, Mr. Recio submits the accompanying supporting Memorandum of Law, Declaration of Amber Donner and Exhibits A-C.

Dated: June 07, 2023
New York, New York

Respectfully submitted,

s/Amber Donner
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